



The City of
OKLAHOMA CITY
 PLANNING DEPARTMENT

January 30, 2019

EPA Region 6
 Attn: Paul Johnson
 1445 Ross Avenue
 Suite 1200 (6SF-VB)
 Dallas, TX 75202-2733

Dear Mr. Johnson:

Oklahoma City's proposal for a Brownfields Assessment Grant is enclosed. This proposal requests \$100,000 for Petroleum and \$200,000 for Hazardous assessments. These funds would support projects in the Core to Shore area and surrounding Neighborhood Revitalization Strategy Area (NRSA), an area approved by the U.S. Department of Housing and Urban Development (HUD) that is by definition economically distressed.

In 2012, The Oklahoma Department of Transportation (ODOT) moved I-40 five blocks south which reconnected the downtown core of the City to the shore of the Oklahoma River in the heart of the NRSA. This previously disconnected area suffers from disinvestment and blight. The City has undertaken expansive public planning initiatives to lay out a vision for sustainable development, infrastructure, public spaces, transit and private investment in this area and has begun implementing redevelopment projects, including installing an urban streetcar, and building a new grand 70-acre park. The City believes that these efforts will catalyze surrounding redevelopment leading to a healthier, more dense and improved environment and quality of life for area residents. Assessment dollars will support development projects on sites within the NRSA with focus in the C2S area. High priority projects and sites include;

1. Core to Shore Housing Developments – Key locations have been identified around the Northern Public Park for housing development.
2. The Humane Society – The Oklahoma Humane Society anticipates building a state of the art facility and is looking for properties within the NRSA for their new location.
3. The Latino Community Development Agency (LCDA) – The LCDA is expanding their services by acquiring addition properties and building.
4. The Producers Cooperative – This 37-acre industrial site, built on the Historic Oklahoma City Oil Field, housed a facility that processed cotton seed and was the largest generator of PM10 pollution in Oklahoma County and #2 in VOCs and PM2.5 releases.
5. New Oklahoma City School - The Core to Shore TIF includes \$16.6 million designated to the construction of a middle school and high school.

1. **Applicant Identification:**
City of Oklahoma City
420 West Main, Suite 900
Oklahoma City, OK 73102
2. **Funding Requested:**
 - a. Grant Type: Community Wide Assessment
 - b. Federal Funds Requested: \$300,000; A waiver is not being requested
 - c. Contamination: Both; \$200,000 Hazardous and \$100,000 Petroleum Substances
3. **Location:** This proposal would serve the City of Oklahoma City, Oklahoma County, Oklahoma
4. **Property Information for Site Specific:** Not Applicable
5. **Contact**
 - a. Project Director:
Amanda Alewine
420 West Main Street, 9th Floor
Oklahoma City, OK 73102
E-mail: amanda.alewine@okc.gov
Phone: 405-297-1766;
 - b. Chief Executive Officer:
David Holt, Mayor
200 North Walker Avenue
Oklahoma City, OK 73102
E-mail: mayor@okc.gov
Phone: 405-297-2424;
6. **Population - Oklahoma City:** 665,635
7. **Other Factor Checklist –** The priority area is adjacent to a body of water, the Oklahoma River
8. **State Letter:** See Attachment

The narrative grant proposal and required information is attached to this cover letter. Should you have questions regarding this proposal, please contact me at 405-297-1766.

Sincerely,



Amanda Alewine
Planning Department
City of Oklahoma City



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

January 28, 2019

Amanda Alewine
Oklahoma City Planning Department
420 West Main, 9th Floor
Oklahoma City, OK 73102

Subject: State Acknowledgement Letter for the FY19 Brownfields Community-Wide Hazardous Substances and Petroleum Assessment Grant Application for Oklahoma City, Oklahoma

Dear Ms. Alewine:

The Oklahoma Department of Environmental Quality (DEQ) acknowledges and supports the City of Oklahoma City in their application for a U.S. Environmental Protection Agency Brownfields Community-Wide Combined Hazardous Substances and Petroleum Assessment Grant.

The Community-Wide Assessment Grant will assist the City in support of the on the Neighborhood Revitalization Strategy Area, which includes a subarea called Core to Shore (C2S). High priority sites include; C2S Housing, Humane Society Headquarters, Latino Community Development Agency expansion, Producers Cooperative, and the New Oklahoma City School. The City is requesting \$200,000 in Hazardous Substances and \$100,000 in Petroleum Funding on their Community-Wide Assessment Grant Proposal.

The DEQ encourages the voluntary cleanup and reuse of contaminated properties and has successfully partnered with the City on several projects that have had a positive impact on the community. DEQ staff members are available to consult with the City on Brownfields issues and provide technical assistance as needed. For additional information, please contact Heather Mallory, one of my staff at (405) 702-5135. I wish you great success in this endeavor and look forward to working with you in the future.

Sincerely,

A handwritten signature in blue ink, appearing to be "KD", with a large, stylized loop at the end.

Kelly Dixon, Director
Land Protection Division

KD/hm

BOB ANTHONY
Commissioner

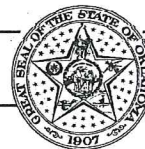
DANA MURPHY
Commissioner

TODD HIETT
Commissioner

OKLAHOMA
CORPORATION COMMISSION
P.O. BOX 52000
OKLAHOMA CITY, OKLAHOMA 73152-2000

255 Jim Thorpe Building
Telephone: (405) 521-2500
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OIL & GAS CONSERVATION DIVISION



POLLUTION ABATEMENT
Underground Injection Control

January 23, 2019

Amanda Alewine
OKC Planning Department
420 W. Main, 9th Floor
OKC, OK 73102

Re: Petroleum & Hazardous Assessment Grant

Dear Mrs. Alewine,

I am pleased to acknowledge and strongly support the City of Oklahoma City's proposal to the U.S. EPA for Brownfields assessment funds for 2019. I understand that the requested Assessment Grant would significantly assist the City in continuing their redevelopment work in the Neighborhood Revitalization Strategy Area which includes the Core to Shore subarea. Your past experience with assessing multiple types of brownfields leads us to believe that the City of Oklahoma City would use an assessment grant efficiently and effectively regarding petroleum storage tanks, exploration and production wells, and any other type of petroleum contamination issue.

As Brownfields Program Manager at the Oklahoma Corporation Commission (OCC), I am excited that this grant would give Oklahoma City the opportunity to assess properties and understand the contaminants that exist and are in need of abatement. Your work will blend closely with our efforts to reduce the number of Brownfields sites in both Oklahoma City and the state of Oklahoma. OCC staff members are available to consult with you on Brownfields issues and provide technical assistance as needed. I wish you continued success in your endeavors and look forward to working with you in the future.

Best Regards,

A handwritten signature in blue ink that reads "Madeline Dillner for Jeff Myers".

Jeff Myers
Regulatory Program Manager
Brownfields
Oklahoma Corporation Commission
j.myers@occemail.com
405-522-2764

The Narrative

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION (30 Points)

1. a. Target Area and Brownfields (15 points)

1. a.i. Background and Descriptions of Target Area (5 points)

The target area for this proposal is the Oklahoma City **Neighborhood Revitalization Strategy Area (NRSA)** which includes a subarea called **Core to Shore (C2S)**. The NRSA is a designated area in our central city core approved by the U.S. Department of Housing and Urban Development (HUD) as a distressed area worthy of special focus for reinvestment of human and economic capital and creating opportunities to empower low-income residents. NRSA boundaries were established in 2002 through an intensive citizen participation process. The NRSA has an average household income around 60% of the area median income and poverty, housing, employment and infrastructure challenges. While revitalizing, the area is continually faced with new issues, challenges and opportunities, many of which are tied directly to brownfields in the community.

Vacancy, blight, environmental challenges and economic disadvantage in the NRSA neighborhoods were exacerbated by the historic location of the Interstate 40 (I-40). In 1964, I-40 was built as an elevated interstate through the NRSA's center, bisecting OKC. The neighborhoods south of I-40, cut-off from downtown, began to decay. While these neighborhoods continued to decline, industrial uses (such as automotive facilities, salvage yards, large production facilities and dry cleaners) invaded the area creating an undesirable mix of low-income residential next to industrial land uses. In 2010 the City did a study of the portion of the NRSA south of I-40, currently called the **C2S area**, and deemed the area blighted.

The I-40 elevated interstate became a blight of its own. I-40 was designed for 76,000 vehicles a day but by 2010 was traveled by nearly 120,000 vehicles daily. The elevated interstate was in constant disrepair. In 2007 a hole in the I-40 pavement resulted in closure of all but one lane and created significant traffic delays. The hole, along with falling chunks of concrete, led to citizen outcry about the elevated interstate safety. It was not until 2012, after many years of public discussion and coordination, that the Oklahoma Department of Transportation (ODOT) relocated I-40 five blocks to the south in the downtown area. This action reconnected the urban core of the city south to the shore of the Oklahoma River (i.e., the C2S area.) After extensive public engagement, the City adopted the *C2S Plan* in 2008 and *PlanOKC*, the City's comprehensive plan, in 2015. The plans lay out a vision for sustainable development and infrastructure, public spaces, public transit and incentives for private investment in the C2S of the NRSA, the area for assessment activities.

1.a.ii. Description of the Priority Brownfields Sites (10 points)

Assessment dollars will support development projects on sites within the NRSA with focus in the C2S area. High priority projects and sites include; C2S Housing, Humane Society Headquarters, Latino Community Development Agency expansion, Producers Cooperative, and the New Oklahoma City School. Assessment activities are critical to support safe redevelopment as prior studies in the area documented contamination resulting from: historical refining, oil and gas well development, stored chemicals, battery manufacturing, asbestos in building materials, former dry cleaners, gas stations, salvage yards (proposed infill housing areas of C2S), closed cotton & canola seed processing plant operations (Producers Co-Op), and multiple automotive-related services. New development is expected to occur proximate to the Oklahoma River.

Additionally, this area is within the old Oklahoma City oilfield and according to the Oklahoma Corporation Commission (OCC), 155 oil wells are in the NRSA; 87% are active. Thirteen percent of the wells are plugged, but based on closure dates and techniques, could still pose hazards. Contaminants found in area soils have included **petroleum hydrocarbons, metals, acid sludges, semi-volatile compounds and animal carcass**

pits. These historical releases have rendered the groundwater unusable throughout the area. Illicit dumping, unsecured chemical storage, and salvage operations have also been documented. near residential areas in the NRSA.

1.b. Revitalization of the Target Area (9 points)

1.b.i. Redevelopment Strategy and Alignment with Revitalization Plans (5 points)

OKC brownfields program is in the Planning Department and projects fall within the framework of wider community planning efforts. Community stakeholders have been actively involved in these efforts since the 1990's. This includes:

- In 1996, the City and the ODOT worked with various citizen groups to determine options to handle the decay of I-40. Pros and cons of 7 alternate routes were developed and studied. In December 1998, ODOT announced the locally preferred alternate.
- The 2008 Core to Shore Plan (C2S area inside the NRSA) included a citizen's steering committee that met monthly and the public process included targeted task forces, workshops, and multiple public meetings. The plan calls for major civic improvements and private mixed-use development, linking the traditional City center to the Oklahoma River.
- 2010 – 2015 *PlanOKC* (OKC's comprehensive plan adopted July 2015) public engagement included 80+ public meetings, 20,000+ participants, 23 school districts, eight component Stakeholder Groups, City Staff Working Groups, a Healthy Communities Oversight Group, focus groups, and a Citizens' Advisory Team to maximize community involvement. The plan represents a shared vision for the future of the city and is a policy document used by City leaders, developers, business owners, and citizens to make decisions about future growth, development, policy and capital improvements.

The redevelopment strategy in the NRSA involves connecting the core of downtown Oklahoma City to the shore of the Oklahoma River. The priority projects and sites identified in this proposal along with other sites in the NRSA are consistent with local plans and will advance this connection of the Core of Oklahoma City to the Shore of the Oklahoma river through infill development.

1.b.ii. Outcomes and Benefits of Redevelopment Strategy (4 points)

This assessment grant will assist in promoting safe redevelopment of the target area. With planned redevelopment to include housing and commercial spaces, the area will benefit from a renewed sense of community and purpose, closed gaps in infrastructure and land use, and re-connection to the City.

Redevelopment will increase density, result in increased property tax revenue, (over 58% of which goes to schools), provide jobs and reduce crime. Benefits will include an increased number of blended affordable and market rate housing units to be built around the river area, new Downtown Public Park and new streetcar route that opened in 2018. By supporting projects around new transit options, residents will have options to reduce the number of car trips or go car-less, **which supports energy efficiency, improves air quality, and lowers household expenses.**

1. Housing development around the Downtown Public Park will support access to a centerpiece green space which improves air quality. The park provides those who live in proximity opportunities for walking/biking/running trails, outdoor recreation, a link to the Oklahoma River and will promote a healthy lifestyle. Developing mixed-income housing will be key in revitalizing the blighted area.

2. Redevelopment of the Producers Cooperative site, previously a major emitter of air quality pollutants, will improve air quality, bring in property taxes, sales tax and create jobs.
3. Expansion of the nonprofit Latino Community Development Organization will provide increased community services for low income Latinos in the area. LCDA is next to the Southern Downtown Public Park and is raising funds to expand their campus.
4. The nonprofit Central Oklahoma Humane Society is looking for a new location in the NRSA to combine multiple facilities into one state of the art headquarters.

These projects are designed to improve quality of life for OKC's residents and act as economic drivers. They encourage a healthy lifestyle and reduce the cost of transportation by promoting reduced reliance on automobiles. Options for healthier lifestyles is important as residents suffer from high rates of obesity (over 36.5% of Oklahoma adults and 18.7% of 10 to 17-year-olds were obese in 2017 (ref. State of Obesity website)). Alternate transportation modes benefit public health in improving air quality by reducing ground-level ozone-forming emissions.

1.c. Strategy for Leveraging Resources (6 points)

1.c.i. Resources needed for Site Reuse (4 points)

Assessment funds will be used to determine the nature and extent of existing contamination on redevelopment sites and enable cleanup planning. This will stimulate the use of our 2018 **\$800,000 Brownfields RLF** for remediation.

1. Core to Shore Housing –The City is a core partner in a HUD-DOT-EPA Partnerships for Sustainable Communities grant from HUD which funded the 2013 & 2014 studies that support the need for infill housing. Key locations and a few specific sites have been identified; environmental assessments are needed.
2. Humane Society – The Oklahoma Humane Society anticipates building a state of the art facility and is looking for properties within the NRSA for their new location. Private funding is being raised.
3. Latino Community Development Agency (LCDA) – LCDA is evaluating expanding services (health, child development, and treatment) near their location in the NRSA by acquiring additional property and building.
4. Producers Cooperative – This 37-acre industrial site, built on the Historic Oklahoma City Oil Field, processed cotton seed and was the largest generator of PM10 pollution in the county and #2 in VOCs and PM 2.5 releases. The site closed mid-2015. A pending sale fell through due to multiple challenges, but it is a key location and other prospective purchasers may need assistance with redevelopment.
5. New Oklahoma City School - The Core to Shore TIF includes \$16.6 million designated to constructing a middle school and high school in the NRSA. Fifty new jobs are estimated.

The City has a variety of public funding resources in combination with private equity, conventional financing, tax credits and other instruments potentially available to facilitate reuse of Brownfields sites. Specifically, the following leveraged resources may be options where appropriate to support city brownfields projects:

- Brownfields personnel cost is partially funded through the City's General Fund
- New Market Tax Credits
- Community Development Block Grants
- Private Foundation Grants (Reynolds Foundation, Magic Johnson Foundation)
- Section 108, Small Business, and Economic Development Administration Loans
- Fixing America's Surface Transportation Act funds & Dept. of Transportation grants

- Capital Improvement Program/GO Bond financing for public improvements projects which support private development.
- Tax Increment Financing (TIF) districts within the NRSA

1.c.ii. Use of Existing Infrastructure (2 points)

Consistent with sustainable development, the NRSA has existing infrastructure that will be used and upgraded as needed. Scheduled street, drainage, and park/recreational green space improvements in the area have designated funding through GO Bonds, and a Better Streets, Safer City one-cent sales tax initiative approved in 2017.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT (20 Points)

2.a. Community Need (12 points)

2.a.i. The Community's Need for Funding (3 points)

The NRSA's sustained poverty and historic lack of investment have resulted in vacancy and blight. According to the 2010 *Core to Shore Blight Study*, from 1990 to 2000 owner occupied houses decreased by 1.6 % with only 37% of homes being owner occupied. This starkly contrasted with a citywide increase of over 6% in owner occupancy in the same time period, with over 53% of the city's properties being owner occupied. The study found the area's infrastructure in poor condition, causing unsafe pedestrian travel along the street edge and flooding due to lack of curbing.

OKC has experienced a rise in the homeless population - most of whom reside in the NRSA and often shelter in vacant buildings. The OKC Homelessness Point in Time Study counted 1,481 homeless in 2018. Vacant and abandoned properties within the NRSA contain lead and asbestos contaminants. Empty buildings are frequently razed for copper, with asbestos materials shredded in the process resulting in exposures.

Assessment funds are needed to identify and address area contaminants to support the infill redevelopment strategy of connecting the downtown core to the Oklahoma river shore.

2.a.ii. Threats to Sensitive Populations (9 points)

(1) Health and Welfare (3 points)

Brownfield sites and resulting disinvestment in the NRSA directly affect community health, particularly to the large number of sensitive and EJ populations living there. Brownfields can be costly to redevelop and as a result are often left vacant or abandoned presenting a physical danger and social cost to the community.

Residents in the NRSA are 61.6% minority. The median income in the NRSA is \$28,769, about 50% of the national average; unemployment is over double the city's rate. The poor community social welfare has resulted in a visible homeless presence. Environmental justice is a concern in low-income, minority, and otherwise disadvantaged population of the NRSA as the community has been shown to endure a high burden of pollution. NRSA residents **have experienced a sustained poverty level of 33% or above for over 15 years** and live in an area with a proportionately high number of environmentally distressed properties.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions (3 points)

The NRSA has a disparate amount of environmental challenges compared to the city and US. Concerns range from air quality, proximity to contaminated sites, widespread groundwater impacts, to the physical and social threats of blight and industrial contamination. The EPA environmental justice (EJ) screening tool combines environmental and demographic indicators to create EJ index categories and compares these across geographic

regions. People in the NRSA are among the most vulnerable for exposure to environmental risk indicators affecting EJ populations (above 80%, across all categories).

Several major highways transect the NRSA with traffic that impacts area air quality and causes noise pollution. 5,856 households live within 1,500 feet of a major highway with 2,215 of those being within 500 feet. Besides being another source of pollutants to land, air and water (auto/truck emissions and stormwater runoff), these mega roads present a physical boundary to pedestrians and restrict access to community facilities, including schools, parks, and community centers, as well as to sources of healthy food.

Air pollution and risks are likely related to the proximity of industry (petroleum, salvage yards, production facilities) and major transportation corridors located adjacent to the NRSA.

As indicated by the EJ tool, many NRSA residents live close to current or former industrial operations or hazardous waste storage/disposers. Across the NRSA, groundwater has been negatively impacted by industrial operations. The C2S area in the NRSA has been a cluster area for small auto repair related businesses, salvage yards and oil wells (collectively covering over 70 acres) - industries that have released petroleum, solvent and metal contaminants to soils and groundwater. Most of the NRSA has access to City drinking water, however, water wells still exist and there is no prohibition against drilling water wells in most parts of the City.

In addition to the EJ factors listed above, the Oklahoma City-County Health Department (OCCHD) developed a list of variables that include both determinants and outcomes of health and wellness. The data that makes up the wellness score was collected at a zip code level and available for 2010-2012. The OCCHD Wellness Now score for the 13 zip codes that make up the NRSA raises concern of the **collective area exposures and health outcomes for low income and minority populations affected by pollution, blight, restricted access to healthy foods, low pedestrian access and overall disinvestment**. Incidence of mortality in the NRSA is above the national average of death/100,000 people in the following categories.

	Cardiovascular Disease Mortality	Chronic Lower Respiratory Disease	Cancer Mortality	Lung Cancer Mortality
NRSA	353	67	238	66
US	234	42	173	48

29.2% of households within the NRSA are within a ¼ mile of an oil or gas well. Airborne dust and particles from these sites can cause or exacerbate Asthma and Reactive Airway Syndrome of downwind residents.

(3) Economically Impoverished/Disproportionately Impacted Population (3 points)

Table 1: Populations and Economic Indicators

The NRSA has a 35.4% poverty rate, is 61.6% minority, and has an 8.6% unemployment rate with a Median Household Income of \$28,769- almost half the national level. Approximately 75% of the NRSA is classified by the US Department of Agriculture as a food desert. Lack of access to healthy food is exacerbated by limited transportation options and pedestrian-friendly streets. A 2014 study by the Mari Gallagher Research and Consulting Group reported that individuals living more than 1/2 mile from the nearest full-service grocer and who lack access to a vehicle are more likely to die prematurely from diabetes, diet-related cancers, stroke and liver disease than those living where grocers are closer and transportation is readily available. While obesity rate data is not available on city level, Oklahoma County (where the NRSA is located) has some of the highest rates of obesity in the state, at 30.20% based on 2015 data. This grant will assist in redeveloping the area.

Revitalizing vacant buildings and properties, increases density, creates jobs, and lowers poverty levels. This results in an economic draw to the area for services such as grocery.

2. b. Community Engagement (8 points)

2.b.i. Community Involvement (5 points)

Key community partners with the Brownfields program's redevelopment efforts are listed below:

Organization	Description/Role
<u>Alliance for Economic Development of Oklahoma City</u> Point of Contact Nicole Goodman nicolle.goodman@theallianceokc.org (405) 604-6780	This local non-profit economic development agency is focused on working with the private sector on financing redevelopment projects. The Alliance will assist in identifying sites needing assessment funding for redevelopment and will integrate the Brownfields (BF) program with development deals and public meetings in the NRSA.
<u>Urban Land Institute (ULI)</u> Point of Contact Michelle McBeath michelle.mcbeath@uli.org (417) 773-1838	ULI provides leadership in responsible land use and creating thriving communities worldwide. Members include lenders, developers, planners, and real estate professionals. ULI will assist the City through educational efforts by promoting the Brownfields program during redevelopment seminars and networking events.
<u>Community Action Agency of Oklahoma City and Oklahoma/Canadian Counties, Inc.</u> Point of Contact Bonnie Schwartz Bschwartz@caaofokc.org (405) 232-0199 x 3205	CAA is a grass roots agency that promotes self-sufficiency of socially, economically, and culturally disadvantaged citizens. CAA addresses substance abuse, home repair, child-care, economic development, and home ownership. CAA will partner through education and direct assistance by identifying businesses seeking to acquire property in the NRSA and connecting them with the Brownfields staff. Small business loans may be available through CAA to qualifying owner-operated businesses that locate on Brownfields sites.

2.b.ii. Incorporating Community Input (3 points)

The City understands the importance of engaging the community, sharing information, soliciting and incorporating public input as demonstrated in our planning processes. Highlighting successes and demonstrating progress to the community is also critical.

The City's Brownfields Program ties into existing development and planning meetings which encourages greater stakeholder participation. City staff speak in public forums, actively seek input on site selection and planning in the NRSA, and are available via phone, email or in person to share and seek information. For projects that require more personal meetings with landowners and project partners staff act as community liaisons to explain the brownfields program and assessment processes. In addition, staff attends:

1. **Citizens Committee for Community Development** meetings. This standing committee exists to provide the City with citizen input on development, monitoring, and updating of the Community Development Programs affecting persons of low and moderate incomes and the neighborhood districts in which they reside. It comprises representatives from all eight wards of OKC. Public meetings generally occur bi-monthly. Reports and milestones for Brownfields projects are discussed in this meeting.

2. Project specific efforts will be made with owners and perspective purchasers to inform and involve the community and other stakeholders during the planning and implementation of projects where Brownfield Assessment funds are used. Such efforts could include:
- Presentations at City Council meetings, a public meeting broadcast on channel 20. The City Council is made up of elected officials from the 8 wards in Oklahoma City. Their priorities are to: Promote safe, secure, and thriving neighborhoods; Develop a transportation system that works for all residents; Maintain strong financial management; Enhance recreational opportunities and community wellness; Encourage a robust local economy; Uphold high standards for all city services; and Continue to pursue social and criminal justice initiatives.
 - Presentations at Planning Commission meetings, a public meeting broadcast on channel 20. The Planning Commission uses *PlanOKC* to make decisions about future growth and development. This document provides long range policy direction for land use, transportation, economic development, housing, public services, and natural and cultural resources.
 - Engagement with neighbors is typically done by the developer when input is needed or to inform them when assessment and redevelopment efforts may affect them,
 - Presentations at partner agency board meetings. Many of our projects involve partner agencies that require developers to present redevelopment plans to the board and seek input on approvals.
 - Neighborhood Meetings – Many projects are presented at neighborhood meetings to get neighborhood input and buy in.

Staff distributes information by several means including timely entering assessment results into EPA's ACRES database; the information is then publicly available on EPA's Cleanups in My Communities website. Project information and successes are also shared on the City's website. City staff will continue to attend community meetings, provide updates, and coordinate with the City's Public Information Department in efforts to engage the community and communicate progress.

3. TASK DESCRIPTIONS, COST ESTIMATES, & MEASURING PROGRESS (35 Points)

3.a. Description of Tasks and Activities (15 points)

3.a.i. Project implementation (10 points)

City staff are now engaged in community outreach and negotiation of site access agreements and can initiate project activities upon issuance of a Cooperative Agreement. The City follows competitive procurement procedures adopted by City Council to hire environmental consultants to perform assessment work.

Task 1- Programmatic Support (Hazardous Materials \$5,250 and Petroleum \$5,250): Staff time for programmatic support is estimated at 180 hours to be paid from the assessment grant; additional salary costs will be covered from the City's General Fund. Supplies for each grant is estimated at \$500 over 3 years for computer-related hardware, paper, ink, pens and other miscellaneous office supplies. A portion of the funds will be used to offset costs for travel and education/training for staff to attend the National Brownfields Conference or other brownfields venues.

Task 2-Phase I & II Environmental Site Assessments (Hazardous Materials \$183,184 and Petroleum \$85,104): Activities are anticipated at priority sites as well as other locations within the NRSA. After sites are selected and prioritized, staff will verify site eligibility. A Quality Assurance Project Plan will be completed for review and approval by EPA. Phase I Environmental Site Assessments (Phase Is) will be completed in conformance with EPA's All Appropriate Inquiry (AAI) regulation and current ASTM standards. Based on

the Phase I results, the City will select potentially affected sites for Phase II Assessment. Site Reports and progress will be tracked and recorded in the ACRES database. The cost assumes about 18 hazardous and 7 petroleum related Phase Is will be completed along with 3 hazardous and 2 petroleum related Phase IIs. **This budget assumes an average per site cost of \$3k - \$4k for the Phase Is and \$30k - \$40k for Phase IIs. Most of the funds (estimated at \$165,000 collectively) is expected to be spent on Phase II ESAs.**

Task 3- Focused Use-based Cleanup Planning: (Hazardous Materials \$6,270 and Petroleum \$4,530): After Phase II reports are completed, staff and the consultant will develop a use-based cleanup plan for an estimated 3 sites (two hazardous sites and one petroleum site). Preparation of cleanup plans will be consistent with submittal requirements of ODEQ and/or OCC.

Task 4- Community Involvement (Hazardous Materials (\$5,206 and Petroleum \$5,206): The City will include interested community residents, businesses, property owners and stakeholders through all phases of project planning and implementation. Staff will track and measure site progress through the redevelopment process. Public communication will be accomplished with help from our community partners and through existing meetings and media. The timeline for the grant is:

Project Timeline	
Cooperative Agreements negotiated	Aug 2019 – Oct 2019
Advertise RFP for environmental consulting and select contractor.	Sept 2019 - Oct 2020
Complete Generic Quality Assurance Project Plan for EPA approval	Nov 2019
Obtain Access Agreements	Nov 2019 – On going
Participate in community outreach forums, verify site eligibility	Dec 2019 – On going
Conduct Phase I ESAs for petroleum and hazardous materials sites	Jan 2020 – On going
Conduct Phase II ESAs for petroleum and hazardous materials sites	Feb 2020 – On going
Prepare focused, use-based cleanup plans	July 2020 – On going
All assessment activities complete and cleanup plans in place	Aug 2022

3.a.i. Task/Activity Lead (5 points)

The tasks are led by the City's staff along with selected consultants. Details of the staffing and staff qualifications are contained in the Programmatic Capability section below.

3.b. Cost Estimates and Outputs (15 points)

3.b.i. Cost Estimates (10 points)

Categories	Task 1 Programmatic Support		Task 2 Site Assessment		Task 3 Cleanup/Reuse Planning		Task 4 Community Involvement		Total
	Haz	Petro	Haz	Petro	Haz	Petro	Haz	Petro	
Personnel	\$3,000	\$3,000			\$2,000	\$2,000	\$3,000	\$3,000	\$16,000
Fringe	\$750	\$750	-		\$750	\$750	\$750	\$750	\$4,500
Travel	\$1,000	\$1,000	-		-		-	-	\$2,000
Supplies	\$500	\$500	-		-		-	-	\$1,000
Equipment									
Contractual	-	-	\$183,184	\$85,104	\$3,520	\$1,780	\$1,456	\$1,456	\$276,500
Total	\$5,250	\$5,250	\$183,184	\$85,104	\$6,270	\$4,530	\$5,206	\$5,206	\$300,000

3.b.i. Outputs (5 points)

Outputs	Haz	Petro
Quarterly Reports	12	
Sites added to BF inventory	18	8
Phase I Assessment	18	8
Phase II Assessment	3	2
Site cleanup plans	2	1
Community Meetings	10	

The outputs in the table will be documented in quarterly reports and all sites will be entered into ACRES and tracked through the redevelopment process to capture the resulting outcomes identified below.

3.c. Measuring Environmental Results (5 points)

The City enters environmental site assessments into a Brownfields database to track progress. Phase I & IIs are also entered into EPA's ACRES system. Brownfields staff routinely attends community meetings which will be tracked and noted in quarterly reports. The City will track jobs created and document the reuse of sites as they progress. The assessment grants will minimize exposures to contaminants by identifying what sites have contamination and assisting with cleanup planning to remediate/mitigate the sites and prepare them for reuse. Expected outcomes are listed in the chart.

Outcomes	Estimates
Jobs Created	207
Funding Leveraged	\$142 M
Ready for Reuse	56
Greenspace	18

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE (15 Points)**4.a. Programmatic Capability (9 points)****4.a.i. Organizational Structure (5 points)**

The City's Brownfields Program is in the Housing & Community Development Division of the Planning Department. The Planning Department has dedicated staff that manage the implementation and programmatic requirements of approximately 66 federal grant awards. The City has successfully managed all EPA brownfields agreements since 1998. Key staff include:

Chris Varga, Division Manager, has overseen the OKC Brownfields Program for ten years. Mr. Varga has a M.S. in Environmental Science and over 25 years of experience and qualifications to manage staff environmental programs, contractors, interpret data, and provide critical review of plans and processes developed for assessment and remedial plans.

Amanda Alewine, Brownfields Planner has worked in Brownfields redevelopment for the past ten years, in business/real estate development for over 18 years and is a certified Economic Development Finance Professional. Municipal legal counselors are also engaged with this project, with municipal accountants responsible for all financial reporting on this grant.

The City contracts assessment activities to environmental firms with appropriate credentials, qualifications and expertise to do all required assessment and cleanup planning work. Firms are selected in compliance with the Competitive Procurement Standards in 40 CFR Part 31.36.

Staff routinely interfaces with the ODEQ Brownfields staff and personnel in the City Engineer's office responsible for the Quality Management Plan for the Brownfields Program.

4.a.ii. Acquiring Additional Resources (4 points)

Should the City's brownfields positions be vacated, the City has depth within the team to continue until that position can be filled. If a position were vacated, the City would engage its routine personnel process to hire a replacement with the appropriate knowledge, skills and ability.

4.b. Past Performance and Accomplishments (6 points)**4.b.i. Currently Has or Previously Received and EPA Brownfields Grant (6 points)****(1) Accomplishments (3 points)**

OKC has received four RLF grants, nine assessment grants and three site specific cleanup grants. Over one hundred and seventy-five (175) parcels have been assessed through the City's program, with eight projects cleaned up utilizing RLF funds and many others private funds. All work is tracked quarterly through site redevelopment and entered in ACRES.

With projects ranging from multi-family residential, non-profit, public parks, and schools, the City expects EPA's grant dollars to leverage over \$2 billion in development by 2021.

Accomplishments of the City's two open EPA grants and the most recent closed EPA grant are identified as Outputs and Outcomes in the adjacent chart. Accomplishments are updated in ACRES on a quarterly basis once achieved.

OUTPUTS & OUTCOMES	2015 Site Specific Cleanup BF-01F09901 10/1/15 – 3/30/19	2017 Assessment BF-01F37801 10/1/17 – 12/13/18 (Closed)	2018 RLF BF-01F48201 10/1/18 – 9/30/23
Quarterly Reports	12	4	0
Sites added to Brownfields Inventory	1	22	0
Phase I Site Assessment	0	15	0
Phase II Site Assessment	0	5	0
ACM Surveys	0	6	0
Site Cleanup Plans	1	3	1
Community Meetings	36	13	1
Jobs Created	TBD	550+	Unknown
Funding Leveraged	\$101 million est.	\$135 million est.	Unknown
Ready for Reuse	1 exp.	10	Unknown
Greenspace	40 acres exp.	30 acres exp.	Unknown

(2) Compliance with Grant Requirements (3 points)

The City has **complied with all brownfields grant requirements, including work plans, schedules, and terms and conditions. The City has spent all funds allocated to us within the specified grant time.** The City has never received an adverse audit finding on an EPA grant. We have complied with all quarterly reporting, MBE-WBEs, financial status reporting and other reporting required by EPA agreements. Detailed information in each quarterly report conveys the goals, milestones, and other notable accomplishments with applicable dates. **The City routinely enters assessments and project successes information in ACRES.**

The City has two open grants from EPA. They are:

- 2015 Site Specific Cleanup** BF-01F09901 grant period 10/1/15 – 3/30/19. Cleanup is completed; a QAPP compliance report is being prepared to submit to the state for final approval. The City will pull funds to pay the contractor before 3/30/19.
- 2018 RLF** [REDACTED] grant period 10/1/18 – 9/30/23. The City is preparing documents to start the first petroleum cleanup. All funds will be spent by 2023.

The City expended all funds by the end of the grant period for all the closed EPA Brownfields Grants.

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☒ Preapplication
☐ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

01/30/2019

4. Applicant Identifier:

The City of Oklahoma City

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

The City of Oklahoma City

* b. Employer/Taxpayer Identification Number (EIN/TIN):

* c. Organizational DUNS:

0141047770000

d. Address:

* Street1:

420 W. Main, 9th Floor

Street2:

* City:

Oklahoma City

County/Parish:

OK

* State:

OK: Oklahoma

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

73102-4401

e. Organizational Unit:

Department Name:

Planning Department

Division Name:

Community Development Division

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Amanda

Middle Name:

* Last Name:

Alewine

Suffix:

Title:

Senior Planner

Organizational Affiliation:

* Telephone Number:

(405) 297-1766

Fax Number:

* Email:

amanda.alewine@okc.gov

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-18-06

* Title:

FY19 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

FY19 Brownfields Community Wide Assessment Grant

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="300,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="300,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☒ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed: